

Rena Andoh (admitted *pro hac vice*)  
 randoh@sheppardmullin.com  
**SHEPPARD, MULLIN, RICHTER  
 & HAMPTON LLP**

30 Rockefeller Plaza  
 New York, NY 10112  
 Telephone: (212) 653-8700

Lai L. Yip (SBN 258029)  
 lyip@sheppardmullin.com  
 Four Embarcadero Center, 17<sup>th</sup> Floor  
 San Francisco, CA 94111  
 Telephone: (415) 434-9100

Travis J. Anderson (SBN 265540)  
 tanderson@sheppardmullin.com  
 12275 El Camino Real, Suite 100  
 San Diego, CA 92130  
 Telephone: (858) 720-8900

Kazim A. Naqvi (SBN 300438)  
 knaqvi@sheppardmullin.com  
 1901 Avenue of the Stars, Suite 1600  
 Los Angeles, CA 90067  
 Telephone: (310) 228-3700

*Attorneys for Plaintiff and  
 Counterclaim-Defendant Moog Inc.*

Douglas E. Lumish (SBN 183863)  
 doug.lumish@lw.com

Gabriel Gross (SBN 254672)  
 gabe.gross@lw.com

Arman Zahoory (SBN 306421)  
 arman.zahoory@lw.com

Rachel S. Horn (SBN 335737)  
 rachel.horn@lw.com

**LATHAM & WATKINS LLP**  
 140 Scott Drive  
 Menlo Park, CA 94025  
 Telephone: (650) 328-4600  
 Facsimile: (650) 463-2600

*Attorneys for Defendant and  
 Counterclaimant Skyryse, Inc.*

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v

SKYRYSE, INC., ROBERT ALIN  
 PILKINGTON, MISOOK KIM, and  
 DOES NOS. 1-50,

Defendants.

SKYRYSE, INC.,

Counterclaimant,

v

MOOG INC.,

Counterdefendant.

CASE NO. 2:22-cv-09094-GW-  
 MAR

**JOINT STIPULATION  
 REGARDING BRIEFING  
 SCHEDULES**

Complaint filed: March 7, 2022  
 Counterclaims filed: January 30,  
 2023

1 IT IS HEREBY STIPULATED by and between Plaintiff and  
2 Counterdefendant Moog Inc. (“Moog”) and Defendant and Counterclaimant  
3 Skyrise, Inc. (“Skyrise”) (Moog and Skyrise are collectively referred to as the  
4 “Parties”) through their respective attorneys of record, as follows:

5 WHEREAS, on June 14, 2023, Magistrate Judge Rocconi ordered Moog to  
6 amend its trade secret identification within 30 days, and ordered that Skyrise would  
7 have 21 days from the date Moog filed its amended trade secret identification  
8 (“Amended TSID”) to file any motion challenging the adequacy of the Amended  
9 TSID, or alternatively to file a motion to lift the discovery stay (Dkt. 534) (the “TSID  
10 Order”);

11 WHEREAS, on June 28, 2023, Skyrise filed objections to and a motion for  
12 review of Magistrate Judge Rocconi’s TSID, with a hearing noticed for August 24,  
13 2023 (Dkt. 555) (the “Objections”);

14 WHEREAS, on July 12, 2023, the Court granted a joint stipulation by the  
15 Parties agreeing to continue Moog’s deadline to file its Amended TSID, such that if  
16 Judge Wu denied Skyrise’s Objections, Moog’s deadline to file its Amended TSID  
17 would be 7 days after Judge Wu ruled on Skyrise’s Objections, and upon the filing  
18 of Moog’s Amended TSID, the other procedures and deadlines in the TSID Order  
19 would remain in effect (Dkt. 576);

20 WHEREAS, on August 24, 2023, the Court denied Skyrise’s Objections  
21 (Dkt. 610), making Moog’s Amended TSID due on August 31, 2023;

22 WHEREAS, on August 31, 2023, Moog filed its Amended TSID, making  
23 Skyrise’s motion challenging the adequacy of the Amended TSID due on September  
24 21, 2023;

25 WHEREAS, on July 21, 2023, Moog filed an Amended Complaint (Dkt. 579);

26 WHEREAS, on August 14, 2023, the Court granted a joint stipulation by the  
27 Parties agreeing that Skyrise’s Amended Counterclaims would be due on August  
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25, 2023, and that Moog's deadline to file any responsive pleading to Skyryse's Amended Counterclaims (including any Motion to Dismiss) would be September 21, 2023 (Dkt. 605);

WHEREAS counsel for Moog and Skyryse have conferred and agreed that, in order to accommodate the parties' and counsel's schedules and negotiations, a one-week extension of these deadlines is appropriate and will not prejudice any party;

NOW THEREFORE, subject to the Court's approval, the Parties stipulate and agree as follows:

1. Skyryse's deadline to file a motion challenging the adequacy of Moog's Amended TSID or a motion to lift the discovery stay will be extended by one week, from September 21, 2023 to September 28, 2023. Upon the filing of Skyryse's motion, the other procedures and deadlines in the TSID Order shall remain in effect.
2. Moog's deadline to file a responsive pleading to Skyryse's Counterclaims (including any Motion to Dismiss) will be extended by one week, from September 21, 2023 to September 28, 2023.

**IT IS SO STIPULATED.**

Dated: September 19, 2023

**SHEPPARD, MULLIN,  
RICHTER & HAMPTON LLP**

By: /s/ Kazim A. Naqvi  
Kazim A. Naqvi  
Counsel for Plaintiff and Counter-  
Defendant Moog Inc.

**LATHAM & WATKINS LLP**

By: /s/ Gabriel S. Gross  
Gabriel S. Gross  
Counsel for Defendant and  
Counterclaimant Skyryse, Inc.

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**ATTESTATION**

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Gabriel S. Gross, attest that concurrence in the filing of this document has been obtained by all signatories.

Dated: September 19, 2023 /s/ Gabriel S. Gross